

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BISOUS BISOUS LLC,

Plaintiffs,

v.

THE CLE GROUP, LLC,
BISOU UPTOWN MANAGER, LLC, and
JOHN DOES 1-10,

Defendants.

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C.A. No. 3:21-cv-01614-B

DECLARATION OF KENNETH P. KULA

I, Kenneth P. Kula, do hereby declare and state as follows:

1. I am over the age of eighteen and have personal knowledge of the facts set forth in this Declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I am Senior Counsel with the law firm of Buether Joe & Counselors, LLC.

3. Attached as Exhibit A is a true and correct copy of email correspondence between me and Plaintiff's counsel, David Conrad, dated August 5 and 6, 2021.

4. Attached as Exhibit B are true and correct copies of Facebook pages for Dallas's *bisou* CONTINENTAL CUISINE captured on August 9, 2021.

5. Attached as Exhibit C are true and correct copies of webpages for Dallas's *bisou* CONTINENTAL CUISINE captured on August 9, 2021.

I declare the foregoing to be true under the penalty of perjury on the 9th day of August,
2021.

/s/ Kenneth P. Kula

Kenneth P. Kula